

Application No.: 10/606,153
Amendment Dated: 30 December 2005
Submittal of Response

REMARKS/ARGUMENTS

The Applicant appreciates the Examiner's examination of the subject Application and requests that reexamination of the claims and reconsideration of the Application be made in view of the following amendments and remarks.

Claims 1-12 and 14-20 are pending in the present Application. Claims 1, 3, 6, 9, and 14 have been amended. Claim 13 has been canceled.

Claim Objection

1. In the Action, claim 3 was objected to as the original claim referred to itself. Accordingly, claim 3 has been amended to depend from claim 2.

Claim Rejections – 35 U.S.C. §102

3a. In the Action, claims 1-4, 6-9, 12, and 14-20 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 6,084,584 issued to *Naji et al.*

3b. The Action contends, in regards to claim 1, that *Naji et al.* '584 discloses a remote display system comprising: a base station including; a computer (see Figure 1 and col. 6, lines 18-23), a control processor (CPU)(see Figure 1 and col. 6, lines 23-28) and an RF transmitter (see Figure 1 and col. 6, lines 56-63) and at least one display device, including; an RF receiver 88 (see Figures 1, 3, and col. 3, lines 23-31), a display controller 72, 76 (see Figure 3 and col. 10, lines 62-65) and a display unit 32 (see Figures 1, 2A, and 3 and col. 7, lines 64-66).

Claim 1 has been amended to improve readability and to place the claim into better condition for allowance. The Applicant claims, in claim 1 as amended, a remote display system comprising a base station including an RF transmitter for broadcasting a control and data RF signal, and at least one display device including an RF receiver for receiving the control and data RF signal.

The Applicant submits that, in contrast, *Naji et al.* '584 does not disclose either an RF transmitter nor an RF receiver. Rather, the RF devices disclosed in the cited reference

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

are described as transceivers. For example, in Fig. 1 a “host computer system 14 preferably includes a peripheral interface adapter that provides for the bi-directional transfer of the data via an interconnect line 16 to an external transceiver 18” (col. 6, lines 56-59), in Fig. 3 “independent power regulation may be provided for an audio subsystem 80, PCMCIA interface 86 and a short range transceiver 88” (col. 10, lines 34-36), and in Fig. 4 the “short range transceiver driver 104 may further provide for variable encryption and decryption of the low-level driver call data streams that pass through the driver 100” (col. 12, lines 37-40).

As can be appreciated by one skilled in the relevant art, the portable display tablets disclosed in *Nahi et al.* '584 comprise transceivers in order to provide “relatively low cost graphics display and user input devices that allow a computer user to, in effect, operate the host computer system 14 in almost all respects without requiring a physical connection to the host computer 14” (col. 7, lines 18-24). Such operation would not be possible if, for example, the computer included only a transmitter and the display tablet included only a receiver. Accordingly, the Applicant respectfully requests that the rejection of independent claim 1 be reconsidered in view of the above argument and amendment.

3c. The Action also contends, in regards to claim 2, that *Nahi et al.* '584 discloses a control and data interface RF signal comprising display information (see Figure 1 and col. 3, lines 59-68; col. 4, lines 1-21; col. 7, lines 19-25; since the host computer is running the operating system and the tablets can operate the host computer without a physical connection there must be some visual representation on the tablet's LCD in order for the user to operate it). The Applicant respectfully requests that the rejection of dependent claim 2 be reconsidered for the same argument presented for independent claim 1.

3d. The Action further contends, in regards to claim 3, that *Nahi et al.* '584 discloses display information being generated by the host computer (see Figure 1 and col. 4, lines 9-21; col. 7, lines 19-25; since the host computer is running the operating system and the tablets can operate the host computer without a physical connection the host computer must generate the signal and then send it to the tablet). The Applicant respectfully

Application No.: 10/606,153
Amendment Dated: 30 December 2005
Submittal of Response

requests that the rejection of dependent claim 3 be reconsidered for the same argument presented for independent claim 1.

3e. The Action further contends, in regards to claim 4, that *Nahi et al.* '584 discloses display information obtained from at least one of a remote server and a remote operator via the internet (see Figure 1 and col. 7, lines 33-40). The Applicant respectfully requests that the rejection of dependent claim 4 also be reconsidered for the same argument presented for independent claim 1.

3f. The Action still further contends, in regards to claim 6, that *Nahi et al.* '584 discloses an RF transmitter and receiver operating at a frequency comprising a member of the group consisting of a 400 and 900 MHz band (col. 6, lines 61-63; the wireless transceivers must be of the RF type since a low-power 900 MHz frequency is implemented). The Applicant respectfully submits that the cited reference does not disclose either an RF transmitter nor an RF receiver, but rather discloses transceivers. Accordingly, the Applicant requests that the rejection of dependent claim 6 also be reconsidered for the same argument presented for independent claim 1.

3g. Additionally, the Action contends, in regards to claim 7, that *Nahi et al.* '584 discloses an RF receiver powered by a battery (col. 9, lines 27-29; since the table houses a transceiver and the tablet is powered by a battery it is therefore inherent that the transceiver is also powered by the battery). In regards to claim 8, the Action contends that *Nahi et al.* '584 discloses a display unit comprising an LCD (col. 7, lines 64-65). The Applicant respectfully requests that the rejection of dependent claims 7 and 8 also be reconsidered for the same reasons presented for independent claim 1.

3h. The Action further contends that, in regards to claim 9, it includes all of the limitations of claim 1, but also further limits by adding a duplex signal, see claim 1 rejection, and that *Nahi et al.* '584 discloses the use of a duplex signal (bi-directional signal)(col. 6, lines 56-61).

The Applicant claims, in claim 9 as amended, a remote display system comprising a base station including a computer and a single RF software module, the RF software

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

module including a controller and an RF receiver/transmitter. This configuration is disclosed in the specification at page 6, paragraph 0019 wherein the software module may comprise a single component such as available from Venture Technologies, North Billerica, Massachusetts. In contrast, *Nahi et al.* '584 does not disclose a single component - an RF software module including a controller and an RF receiver/transmitter, but rather discloses various separate components including: a short range transceiver 88, a micro controller 64, a power controller 70, and a video graphics controller 72 (see Fig. 3). The Applicant respectfully requests that, in view of this distinction, the rejection of independent claim 9 be reconsidered.

3i. Additionally, the Action contends, in regards to claim 12, that *Nahi et al.* '584 discloses a display device comprising a touch screen for providing feedback from a user (col. 10, lines 66-67 and col. 11, line 1). The Applicant respectfully requests that the rejection of dependent claim 12 also be reconsidered for the same argument presented for independent claim 9.

3j. In regards to claims 14-20, the Action contends that *Nahi et al.* '584 claims method steps paralleled to the structural means cited in claims 1, 6, 12, 11, 12, 12, 4 respectively and are therefore rejected for the same reasons. The Applicant respectfully requests that the rejection of claim 14-20 also be reconsidered for the same arguments presented above for claims 1, 6, 11, and 12.

3k. In summary, respecting the rejection of claims 1-4, 6-9, 12, and 14-20, the Applicant has amended independent claims 1, 9, and 14. In particular, independent claim 9 has been amended to more specifically claim a base station including an RF software module including a controller and an RF receiver/transmitter. Independent claim 14 has been amended to more explicitly claim a method comprising the steps of providing a data output signal to an RF software module and generating an RF control and data interface signal in the RF software module, the signal subsequently broadcast as an RF signal via the RF software module. The Applicant respectfully requests that the rejection of dependent claims 2-4, 6-8, 12, and 15-20 under 35 U.S.C. §102(b) be reconsidered in view of the above arguments presented for independent claims 1, 9, and 14.

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

Claim Rejections – 35 U.S.C. §103

5a. In the Action, claims 5, 10, and 11 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over *Naji et al.* '584 in view of U.S. Patent No. 5,305,197 issued to *Axler et al.*

5b. The Action states, in regards to claim 5, that *Nahi et al.* '584 does not disclose display information comprising at least one of an advertisement, a banner and product data. *Axler et al.* '197 discloses display information comprising at least one of an advertisement, a banner and product data (col. 4, lines 22-24 and 46-53; the scroll sign acts as a banner since sign programming data is sent to it, the signal contains banner data). The Action contends that it would have been obvious to modify *Nahi et al.* '584 with the teachings of *Axler et al.* '197 because it would allow a user to purchase a product or find the new product or price of the product on the hand-held device.

The Applicant submits that there is no motivation to combine the advertisement, banner, and product data teaching of *Axler et al.* '197 with the teaching of *Nahi et al.* '584. Specifically, *Nahi et al.* '584 discloses a portable display tablet operated in conjunction with a base computer system including a host processor for executing an Application program in response to input data (see Abstract). Combining the reference teachings to provide an advertisement, a banner, or product data on the portable display tablet would adversely affect remote operation of the host computer by the user of the portable display tablet since the user would need to clear the display screen to access the Application program of interest. Accordingly, a software designer would not be motivated to incorporate code providing an advertisement, a banner, or product data into the application shared by the host computer and the portable display tablet. The Applicant submits that such display information, taught by *Axler et al.* '197, is not an obvious, much less a desirable, modification to the teaching of *Nahi et al.* '584.

Additionally, the Applicant claims in claim 5 a remote display system comprising a base station including an RF transmitter for broadcasting a control and data RF signal having display information for a display unit, the display information including at least one of an advertisement, a banner, and product data. *Nahi et al.* '584 does not disclose an

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

RF transmitter, but rather discloses a transceiver. Accordingly, the Applicant respectfully requests that the rejection of dependent claim 5 be reconsidered for the argument presented above for independent claim 1.

5c. The Action also states, in regards to claim 10, that *Nahi et al.* '584 does not disclose display device further comprising a proximity sensor. The Action also states that *Axler et al.* '197 does disclose a display device comprising a proximity sensor (col. 4, lines 19-22). The Action further contends that it would have been obvious to modify *Nahi et al.* '584 with the teachings of *Axler et al.* '197 since it would allow for detection of traffic and consumers in the area.

The Applicant submits that there is no motivation to combine a motion detector teaching of *Axler et al.* '197 with the functional characteristics of the portable display tablet teaching of *Nahi et al.* '584. Specifically, a general purpose of the portable display tablet disclosed by *Nahi et al.* '584 is to provide a portable or free-roaming field function computer enabled access device (col. 3, lines 52-54). The display tablet, therefore, is transported by a single user as needed, wherein the user maintains a close proximity to the display tablet when accessing the host computer.

In contrast, *Axler et al.* '197 teaches a motion detector positioned on a unit to gather statistics involving traffic in the area of the unit, and the presence of a consumer near the motion detector. By combining the teaching of *Axler et al.* '197 with the teaching of *Nahi et al.* '584, one would thus produce a device which would continuously verify only the presence of a user operating the portable display tablet. Such a combination does not demonstrate any useful or novel feature and would not, therefore, motivate a display tablet designer to develop such a feature by combining the teachings of *Axler et al.* '197 and *Nahi et al.* '584.

5d. The Action states, in regards to claim 11, that *Nahi et al.* '584 does not disclose a controller configured to read signals from a proximity sensor, that *Axler et al.* '197 discloses a controller configured to read signals from a proximity sensor (see Figure 13). The Action also contends that it would have been obvious to modify *Nahi et al.* '584 with the teachings of *Axler et al.* '197 because it would allow the controller to keep track of

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

traffic and consumers in the area. The Applicant respectfully requests that the rejection of dependent claim 11 also be reconsidered for the same argument presented above for dependent claim 10.

6a. Also in the Action, claim 13 was rejected under 35 U.S.C. §103(a) as being unpatentable over *Naji et al.* '584 in view of U.S. Patent No. 6,130,603 issued to *Briechele*.

6b. The Action states, in regards to claim 13, that *Nahi et al.* '584 does not disclose an RF transceiver and controller as one subsystem, that *Briechele* '603 discloses an RF transceiver and controller as one subsystem (col. 3, lines 54-64). The Action contends that it would have been obvious to modify *Nahi et al.* '584 with the teachings of *Briechele* '603 since power would be conserved. Claim 13 has been canceled, and the limitation of a single RF software module have been incorporated into independent claim 9 as amended, and also into independent claim 14 as amended. The Applicant has argued that none of the cited references teach a single, unitary RF software module.

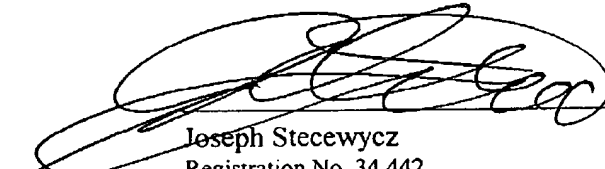
In particular, *Briechele* '603 teaches "a functional block diagram from a prior art configuration for a label" in Fig. 3 (col. 3, lines 54-55). As can be appreciated by one skilled in the relevant art, a functional block diagram does not describe a component, but rather the functionality of a part of the device. As taught in the cited reference, the controller 26 communicates with the rest of the system via conventional analog circuitry, which is not shown. The disclosure provided by the functional block diagram is thus limited and ambiguous, and cannot be taken to imply that a unitary component is being described.

Moreover, the disclosure appears to lack adequate enablement, as both Figs. 3 and 4 include the controller 26, which is presumably the same in each Figure by virtue of having the same numerical identifier. However, an antenna 22 in Fig. 3 is shown as directly connected to the controller 26, while the antenna 22 in Fig. 4 is shown as directly connected to a transceiver 32 – implying that the controller 26 in Fig. 3 is not the same as the controller 26 in Fig. 4. However, even though the composition of the controller 26 may be ambiguous from the two Figures, neither Fig. 3 nor Fig. 4 provides or discloses a single, unitary RF software module as claimed by the Applicant.

Application No.: **10/606,153**
Amendment Dated: 30 December 2005
Submittal of Response

If the Examiner feels that additional discussion and/or amending is needed to place the Application in condition for allowance, the Examiner is invited to telephone the Applicant's representative at the number appearing below.

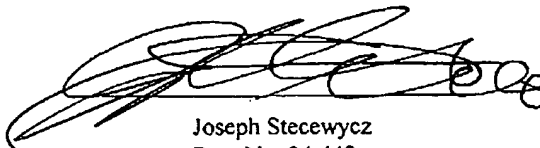
Respectfully submitted,



Joseph Stecewycz
Registration No. 34,442

Tel: 978.448-9095
Fax: 978.448-0350

I hereby certify that this Response to an Office Action mailed on 30 September 2005 is being facsimile transmitted to Art Unit 2677, telephone 571.273.8300 at the United States Patent and Trademark Office on:
30 December 2005.



Joseph Stecewycz
Reg. No. 34,442